

September 28, 2010

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: White Paper on USF Contribution Mechanisms and Prepaid Calling Cards
WC Docket No. 06-122

Dear Ms. Dortch:

Attached is a White Paper discussing various issues related to the prepaid calling card industry that will be relevant to the Commission's reform of the universal service contribution methodology. This White Paper was prepared to follow up and elaborate on various points that were raised in NetworkIP's meeting with staff from the Wireline Competition Bureau on August 18, 2010.

NetworkIP looks forward to remaining engaged with the Commission through the universal service contribution reform process.

Sincerely,



Pete Pattullo
Chief Executive Officer

Attachment